Sarah Greer Sarah.Greer@aporter.com

+1 202.942.5782 +1 202.942.5999 Fax

555 Twelfth Street, NW Washington, DC 20004-1206

March 20, 2014

VIA EMAIL AND FEDERAL EXPRESS

Bonnie Hriczko Removal Action Branch U.S. Environmental Protection Agency, Region II 2890 Woodbridge Avenue, MS-211 Edison, New Jersey 08837

Re: Superior Barrel and Drum Superfund Site

Dear Ms. Hriczko:

This letter responds to the United States Environmental Protection Agency's ("EPA") January 9, 2014 Request for Information pursuant to Section 104(e) of CERCLA ("the 104(e) Request"), sent to Honeywell Safety Products, LLC (EyeSaline) ("Respondent"), concerning the Superior Barrel and Drum Superfund Site ("Site").

As an initial matter, Respondent makes the following objections to and general points with respect to the 104(e) Request:

- A. Respondent generally objects to the 104(e) Request to the extent that it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense or common interest privilege, the self-evaluative privilege, or any other applicable privilege or doctrine. Nothing contained in these objections or the responses below is intended as, or shall in anyway be deemed, a waiver of privilege. Respondent further objects to the 104(e) Request to the extent that it seeks confidential or proprietary business information of Respondent or settlement confidential information.
- B. Respondent generally objects to the 104(e) Request to the extent that it seeks information and/or documents not in the possession, custody, or control of Respondent.
- C. Respondent generally objects to the 104(e) Request to the extent that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence or information necessary or useful to EPA's investigation, or beyond the authority provided in CERCLA Section 104(e).

Ms. Bonnie Hriczko March 20, 2014 Page 2

- D. Respondent generally objects to the 104(e) Request to the extent that it seeks information which may be derived or ascertained from documents already within the knowledge, possession or control of the EPA.
- E. This response reflects a diligent search of Respondent's records, but no representation is made that all such records have been located and searched. Respondent reserves the right to supplement this response in the event that it locates additional responsive non-privileged documents or information, but does not assume the obligation to do so.

Notwithstanding the foregoing objections, and preserving and without waiving them, Respondent responds to the Request, incorporating each of the above objections, as follows:

General Information about the Company

1. a. State the correct legal name of the Company.

Honeywell Safety Products USA, Inc. (herein the "Company" or "Respondent").

b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.

Honeywell Safety Products USA, Inc. is a corporation organized in the state of Delaware.

c. State the name(s) and address(es) of the officer(s) of the Company.

The Company's officers are: Mark S. Levy, David M. DeMeo, available at One Firelite Place, Northford, Connecticut, 06472; John Gerald Boss, available at 21925 Field Parkway, Suite 250, Deer Park, Illinois, 60010; John M. Quitmeyer, available at 1985 Douglas Drive, North Dock, Golden Valley, Minnesota, 55422; Winfield Major, available at 900 Douglas Pike, Smithfield, Rhode Island, 02917; and James M. di Stefano, John J. Tus, Paul H. Brownstein, David A. Cohen, Jim Colby, and Lois H. Fuchs, available at 101 Columbia Road, Morristown, New Jersey, 07962.

d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.

Honeywell Safety Products USA, Inc. is a subsidiary of Honeywell International Inc., also incorporated in the state of Delaware. Honeywell International Inc. has no parent companies. It has approximately 1,300 subsidiaries and 131,000 employees worldwide. It

Ms. Bonnie Hriczko March 20, 2014 Page 3

globally manages business operations through four businesses that are reported as operating segments: Aerospace, Automation and Control Solutions, Performance Materials and Technologies, and Transportation Systems.

Honeywell International Inc.'s executive officers are: David M. Cote; Katherine L. Adams; David J. Anderson; Roger Fradin; Alexandre Ismail; Mark R. James; Terrence S. Hahn; Andreas C. Kramvis; Timothy O. Mahoney; Krishna Mikkilineni, available at 101 Columbia Road, Morristown, New Jersey, 07962.

Honeywell International Inc. acquired Sperian Eye & Face Protection, Inc., the manufacturer of EyeSaline, in 2010. See infra Response to Question 3.a. EyeSaline was originally manufactured by the Fendall Company, which was acquired by Sperian Eye & Face Protection, Inc. in 2007. The Sperian Eye & Face Protection business was later reorganized under the umbrella of Honeywell Safety Products USA, Inc.

e. If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.

Please see Response to Question 1.d.

f. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.

As set forth herein at Response to Question 3.a., after a thorough and diligent search, Respondent is not aware of any entity that transacted business with Superior Barrel and Drum ("SBD").

2. a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.

Honeywell Safety Products USA, Inc. has a large portfolio of products for eye, face, and hand protection, protective clothing, professional footwear, first aid and hearing and respiratory protection. Please also see Response to Question 1.d and Objection C supra.

b. Describe your Company's operations from 1974 to the present and identify all chemicals used or produced as a result of your Company's operations

Ms. Bonnie Hriczko March 20, 2014 Page 4

> during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition.

Please see Response to Question 2.a and Objection C supra.

Company's Relationship to Superior Barrel and Drum ("SBD")

3. a. State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

After a thorough and diligent search, Respondent is not aware of any business transaction with SBD for the disposal, treatment, or storage of any Containers. As provided by Ms. Hriczko, found at the Site were six one-gallon containers of EyeSaline, photographs of which are attached as Exhibit 1, and the inventory logs for which are attached as Exhibit 2. The containers bear EPA identifier numbers 1353-1358.

EyeSaline is a emergency eyewash solution. It is a non-hazardous, non-toxic, sterile, saline water solution that is balanced to the pH and salinity of human tears. EyeSaline is sold through distributors. After a thorough and diligent search, Respondent was not able to identify the distributor from which SBD may have purchased the six containers of EyeSaline.

a. If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company;

Please see Response to Question 3.a.

b. Provide copies of any contracts or agreements between the Company and SBD:

After a thorough and diligent search, Respondent did not identify any contracts or agreements between Respondent and SBD. Please also see Response to Question 3.a.

4. a. For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated;

Please see Response to Question 3.a.

Ms. Bonnie Hriczko March 20, 2014 Page 5

b. State the name, address, and current RCRA Identification Number of each facility;

Please see Response to Question 3.a.

- 5. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format.
 - a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year;

Please see Response to Question 3.a.

b. Identify the number of Containers that were the subject of each such transaction;

Please see Response to Question 3.a.

c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.);

Please see Response to Question 3.a.

d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company products purchased from SBD, Services rendered to or from the Company to or from SBD, etc.)

Please see Response to Question 3.a.

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:
 - (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and

Please see Response to Question 3.a.

Ms. Bonnie Hriczko March 20, 2014 Page 6

(2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

Please see Response to Question 3.a. A material safety data sheet for EyeSaline is attached as Exhibit 3.

6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.

Please see Response to Question 3.a.

7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.

Please see Response to Question 3.a.

- 8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:
 - a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and

Please see Response to Question 3.a.

b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

Please see Response to Question 3.a.

9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.

Ms. Bonnie Hriczko March 20, 2014 Page 7

Please see Response to Question 3.a.

10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

Please see Response to Question 3.a.

11. Identify each person consulted in responding to these questions and all questions on which he or she was consulted.

The persons consulted in the preparation of all Responses to this 104(e) Request include the following individuals:

- a. Helen Fahy
 Remediation Manager
 Honeywell International Inc.
- b. Jeanne WetenhallLegal AssistantHoneywell International Inc.
- c. Winfield W. MajorGeneral CounselHoneywell Safety Products, Americas
- d. Lynn Sylvain
 Global Indirect Sourcing Manager
 Honeywell Safety Products USA, Inc.
- 12. Identify any other person or entity (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title(s) and a description of the responsibilities.

After a thorough and diligent inquiry, Respondent is unable to identify any other person or entity having knowledge of facts relating to the questions which are the subject of this 104(e) Request.

Ms. Bonnie Hriczko March 20, 2014 Page 8

13. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

After a thorough and diligent search, Respondent is unable to identify additional information or documents that may be relevant or useful to identify other sources who may have disposed of or transported Containers to the Site.

Please contact me if you have any additional questions.

Sincerely,

Sarah C. Green

Enclosures (3)

cc: Mr. Tom Byrne, Honeywell International Inc.

Mr. William Tucker, Esq, U.S. EPA, Region II

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

DISTRICT OF COL	umbla
County of:	
all documents submitted in this disable all documents submitted herever immediately responsible for observation is true, accurate, a are complete and authentic unsignificant penalties for submitting imprisonment. I am also aware my response to EPA's Requestional imprisonment in this disable in this dispersion is true, accurately accurately accurately information submitted in this dispersion is true, accurate, a are complete and authentic unit significant penalties for submitted in this dispersion in this dispersion in the properties are completed in this dispersion in the properties are completed in this dispersion in the properties are completed in the propert	nat I have personally examined and am familiar with the ocument (response to EPA Request for Information) and with, and that based on my inquiry of those individuals staining the information, I believe that the submitted and complete, and that all documents submitted herewith less otherwise indicated. I am aware that there are ting false information, including the possibility of fine and that I am under a continuing obligation to supplement at for Information if any additional information relevant to a Request for Information or my response thereto should me.
	SARAH GREER NAME (print or type)
	TITLE (print or type)
	SIGNATURE
HOTARY	Sworn to before me this 20th day of MACA 2014
OF COLUMN	MMM (MMM) (MM) Notary Public
	Sharon Carolyn Jones Notary Public, District of Columbia My Commission Expires 3/31/2014

Exhibit 1

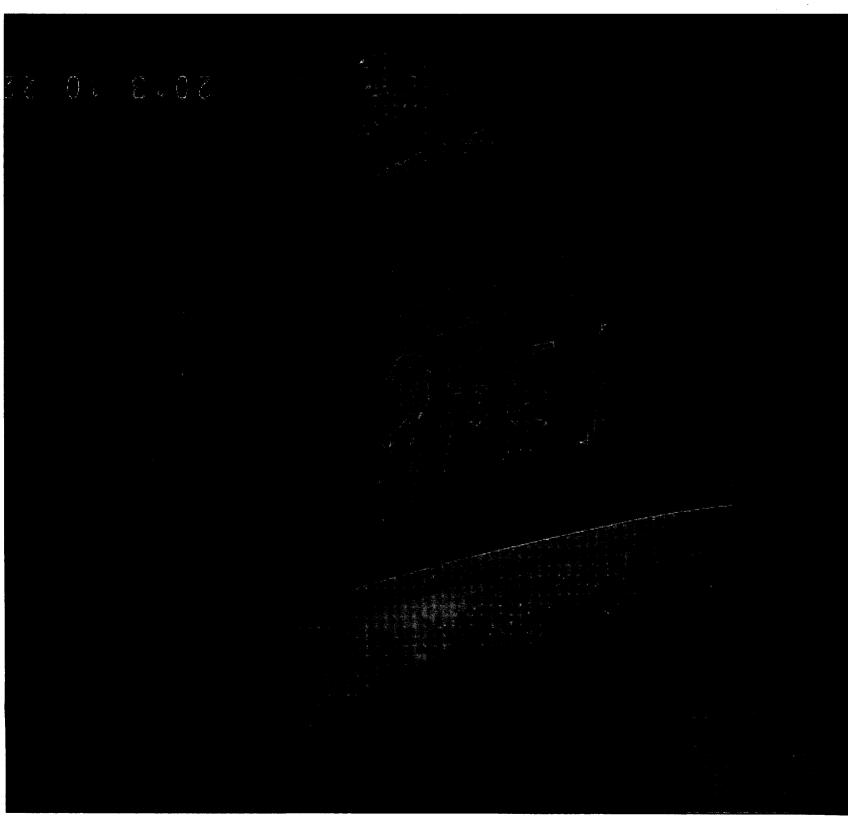


.

.



公司 医防心经 地



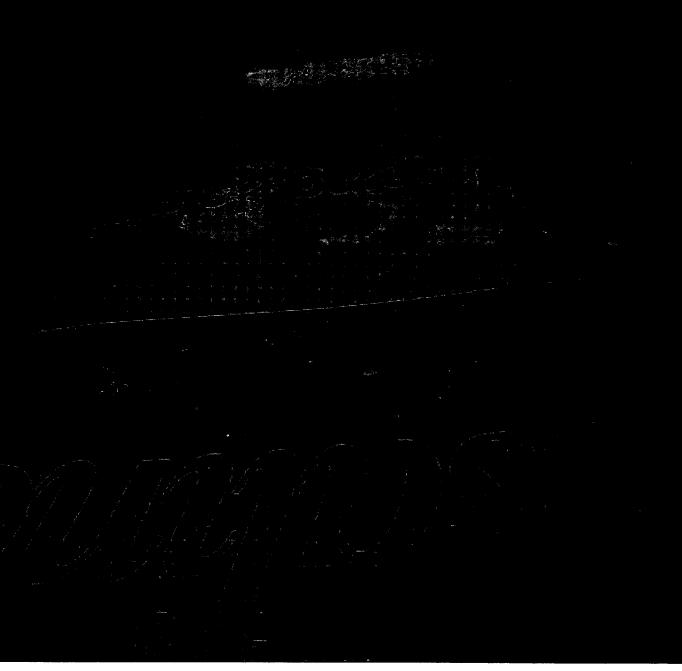


Exhibit 2

1	_	_										DRU	M			L	RUM N	lo. [34	3		
l	KEMRON ENVIRONMENTAL						,		I	VEN	OR	Y		- 1		No. SF					
15	Dno											LO	-				AGE				
	PPO	ECT I	CONT	TION	SUPER				& DRU	M SIT	E L	OGGER _	C	.ن.			_ DAT	E 0/.	23 / 13		
				ACT_		ARY	BEL/	ND				SAMPLE	r <u>C</u>	<u> </u>	•		 -	Time	Œ		
-		VE_			·						WEATH	R									
		YPE:			LINED [Fi	BER	Д.		TEEL [OLY	V	S	AINL	SS STE	EL 🔲	NICK	ŒL 🗍	
_					MEET D		PEC.			E TOP	00D	₫ ,	AIR	1.1			<u> </u>				
I	DRU	M SIZ	E: 1	10	8:	5 🔲	55			42	<u> </u>	30	AIR	16	and the same of th	OOR 10	X	5 1			
				TS: \	OLUME			Щ	XI	3/		1/2		1/4		10	<1/4	3 EX	OTI-	ER [C	AL
1	T	PACI				o 🔯	YE	s L	╀——	0	VERPACI	TYPE:		☐ ST	BEL [Por	.Y 📗	OVERPA	CK SIZE:		
L	_			s. Sta	TE		Colo	R		LARIT	Y	LAYEI THICKNI						D ANALY			
1	A	L I	S	G	1 -				С	C	0		200	pН	·		SÚ	PID/O		ppm	
1	Y	Q	L	E	-	1	USE		L.	L	P	_		•	Л						
]]	E	Ù	I	~	D	1 0	OLOR	s	E A	U	A Q	INCHE	s	OTHER		- (<u>-Al</u>	Car	<u>kine</u>	I	
1 -	R	I	D		G			_	R	Ď	Ü				(A	rgin))			
	3	D	<u> </u>	4	E	↓				Y	E										
Í		₩		┿	+	├			₩-							D	RUM LA	BELS/MA	RKINGS		·
		Λ				 			1					DOTE	T A "7"						
	[=~]	T). /n	00.13	0			<u> </u>				1	DOLL	IAZ_			UN/I	NA		
C	HEM LEGI	NAME ICAL	NAM	JK.	sali. YE i	<u>UŁ</u>	1		<u> </u>	7-1		;					 -				
-	וומר	TONA	L INF	ORM	ATION	- 100	SKJ41	y.	2010	HOV	J.			 -							
<u></u>																				·	
																	<u> </u>				
			,	LAB	ORATOI RK IF DES	CRIPTI	NZAR ON D	D C	ATEGO	RIZAT	TON DA	ΓA			HAZA	RD C	ATEGO	RY:	8 N	10	7
				ABO	VE INFOR	OITAM	n. If	SO, R	EJECT S	ample	AND DO N	от		1	ANAL	YST:		1m		一亿	
				PERF	ORM ANA	LYSIS								ŀ				•	1		-
R.	DIA	TION:		Pos	П		NEG	П			1/	REM/H			DATE	PERF	ORMED	:	1/24	1/1	3
		HYS. S	***			Γ	10					KEW/HJ	HE	<u> </u>	7	т	T .			 	T 2000
_					COLOR	C	LARIT	Y	WA Sc		REACT	pН	DCM Sor		ox	CN	SUL	BIEL-	FLASH	PCBs	PCB Test
A	L	SO	3 S E I	3	USE	C	C	O P					301		+	 		STEIN	POINT	(25ppm)	COMP N
Y	Q	L i	٦ ١	7	STD	E	0		SOLUE S-P		A=AIR	STD.	S OR	+ OR	+ OR	+ OR	+	+	<60ªC	+	ן ט
R	- 4	I D			COLORS	A R	U D	Q	DEN:		W=H20		I	-	-	- OK	OR -	OR -	+	OR -	M B
SA	D		E	_	·		Y	B	110	~ L			Ì	l					OR		E
В	+	+	+	- -					<u> </u>												R
허		+	+-	-			-		<u> </u>												
_ <u>_</u>	MMI	NTS.					Ш														
											- ₩	SA	ow	te-							
PC.	BC	DNC.					PPM			FLA	SH POINT			*C	Отн	FR TE	ST				_
DA Fiei	IA K LD R	EVIE	WER:					_		_	DA	A REVIE	W DA	TE:			31 <u></u>				-
		ROUI									FIE	D REVIE	W DA	TE:							_
,	ĸG	ROUI	NUN	BER:										STREAM							
يرس	vime.	NTS:								-		<u></u>	ASTE	STREAM	1 NUM	BER:		_			
													 -		<u></u>						-
											•										-
Cem	ron F	mira	monte	/ Carry	ices, Inc. le	J															- 1

KEMPON	E						DRU	_					No. 13			
LEMIKON	KEMRON ENVIRONMENTAL					I	NVEN]		Y				t No. <u>Si</u>		_	
PROJECT LOCATI	ON SUPE	מחום	RADDELY	9 Dz.			LO				P	AGE_		OF		
PROJECT CONTAC			BELAND			E D	OGGER _					_ Da	TE			
PHONE						WEATHI		к <u>с</u>	<u> (</u>		-		Tn	ME	 -	
DRUM TYPE: POI	Y-LINED	1	FIBER	77		TEEL		207.11	IV)							
LID TYPE:	RINGTO	P .	П		E TO		₹ - '	OLY	X	S	TAINL	ESS ST	BEL 📗	Nici	ŒL 🗌	
DRUM CONDITION	N: MEET D				G	00D		AIR		Po	OOR	X				
DRUM SIZE: 110 DRUM CONTENTS		5 🗌	55	_	42		30 🔲		16				5 🔲	От	IER (SA(
OVERPACKED:			FULL YES	┽		4	1/2		1/4	_		<1/4		MT		<u> </u>
Рнуз.		1				T	TYPE:		L ST	EEL	Po	LY [OVERP	ACK SIZE:		
L L S	GS	┼—'	Color		LARII		THICKNI					FIE	LD ANAL	YSIS:		
AIO	EL	1	Use	C	C	OP			pH			SÜ	PID/C	OVA	ppm	
YQL	L U	1	STD	E	o	A	INCHE	,]	OTT 1770	. 1		a I	a (.	·		
E U I	D		COLORS	A	ับ	Q	IIICHE.	'	OTHER	·F			Coute	YIVI		
RID	G E			R	D	U		ļ								
A	- - -	 		1	Y	E										
ВХ				 X 				-+				RUM L	ABELS/M	ARKINGS		
c									DOTE	1A7.			I INI/	NA		
MFG NAME _ C \	را دو م	\0												NA		
CHEMICAL NAME	FUL	<u>C.C.</u> Fl.x	wine	100	1							 				_
DITIONAL INFO	RMATION_		30 00.000	30 1	<u>0 110</u>											
																
											===					
	ABORATO	CRIPE	AZARD C	ATEGO	RIZAT	TON DA	ГА			HAZA	RD C	ATEGO	RY:	NL		
. —	ABOVE INFOR	MATIO	n. If so, f	EJECT SA	OH THE	: AND DO N	Ют			ANAL	YST:			Pm		_
I	ERFORM ANA	TASI2					-		ĺ			-		1		
RADIATION: I	Pos 🗌		NEG			1.4	DEMAR			DATE	PERF	ORMEI);	10/21	1/13	
PHYS. STATE				Τ		T N	REM/HI	Hex	-	т	т—	т	·	·	·	,
1	COLOR	C	LARITY	WA'		REACT	pH	DCM		ox	CN	SUL	BIEL-	FLASH	PCBs	PCB Test
L L S G S A I O E L	USE	C	C O L P			<u> </u>	 	SOL	+	+	 -	 	STEEN	POINT	(25ppm)	Соме
YQLLU	STD	E	OA	SOLUE S - P	S-I	A=AIR	STD.	S	+ OR	+ OR	+	+	+	<60ªC	+	N U
RIID G	COLORS	A R	U Q D U	DENS H O		W=H20		I	-	OK	OR -	OR -	OR -	+	OR	M B
S D E			YE	n o	K 15		1		1			l	1	OR		E
B									†	\vdash				 		R
c/A	Compley	X		И		2	17	7	N	N	7	7	N	N		
COMMENTS:		M		<u></u>									7.5	-		
	· · · · · · · · · · · · · · · · · · ·						7	3419	<u> </u>	47						
PCB CONC.			PPM		FLA	SH POINT			ان	O-m-		~~~				
DATA REVIEWER:			~ <u></u>		_	DA [*]	TA REVIE	W DAT	TE:		ek Te	SΓ	-			
FIELD REVIEWER:					<u>-</u>	Fie	D REVIE	W DAT	TE:							
GROUP NUMB	FR.								TREAM							
COMMENTS:							W	ASTE S	TREAM	NUM	BER:					
						·										
Kemron Environmental S	ervices, Inc.	locume	nts\drumle	na doc							,					

•

												DRU	M			D	RUM N	10. <u>13</u>	55		
J. K	KEMRON ENVIRONMENTAL						ENT		Y				۲ No. <u>SF</u>								
PROJE	CTLO	CÁTIC	ON <u>Su</u>	PERI	OP F	ZADI	ODI I	& Day	n 4:0-			LO	3		<u> </u>	P					
PROJE	CT Co	NTAC	л. <u>ос</u>		IRY]			& DKU	M SIT	E				<u>C.</u>			_ DAT	E 10	23/I	3	
PHON			<u> </u>		7(1)	DEL	AND.			W= 4=			R	<u></u>				Tin	Æ		
			Y-LINE	\equiv	_	E	BER			WEAT	HER_										
LDT		: <u>- OL</u>	RING			T	<u>sek</u>		E TO	TEEL	X	<u> </u>	OLY	K	S7	AINL	SS STE	EL 🗌	Nici	ŒL _	
DRUM	CONE	MOTTIC	: MEE	T DC	T SI	PEC.	<u> </u>			OOD	骨	F	AIR		D	200	N/a				
DRUM	SIZE:	110		85		55		_ _	42		<u></u>	10	AIK	 16		OOR 10	X	5 1			
			: Volu				Щ	X	3/		1	/2		1/4		10	<1/4	711	MT		<u> </u>
OVER				No		YE	S_	 	0	VERPA	CK T	YPE:]	IBER	☐ Sī	BEL	Por		OVERPA	CK SIZE:		
	P	HYS. S	TATE	- 1	(Coro	R	(LARIT	Y	_	LAYE	- 1					LD ANALY			
1 1	L	S	G	S				C	C	0	†	HICKNI		pH_			SÚ			}	
1 1		0.	E	L		Use		L	L	P	1		- 1	P**				PID/O	0	2_ppm	
1 7 1	`	L		U D	_	STD		E	0	A		INCHES	3	OTHER	t		GA	1 Co	ntain	121	
1 7 1	I 1	D		G	·	OLOF	rs.	AR	ט מ	Q U			ŀ			Q	1776	5(12))		•
S I	D		1	E				"	Y	E			-								
A		\Box						∇			 					n	DID (T	ABELS/MA	DVDIG		
B	\leftarrow			_									$\neg +$				KOM LA	ADELS/ IVILA	UCKINGS		····
<u> </u>	<u>. </u>													DOTI	IAZ_			_ UN/	NA		
MFG N	AME	ev.	esa	Ga	P							•									
Снемк	CAL NA	AME_	EVE	- F	(U	ink	Na	Sol	<i>.</i> ‡.	M)											
חדוםר"	ONAL]	NFOR	MATIO	7						<u> </u>											
															·						
			ABODA	-																	 -
		N	ABORA AARK IF	Desci	Y JULA RIPUTO	WAR ON TY	D C	ATEGO:	RIZAT	TION D	ATA				HAZA	RD C	ATEGOI	RY:	NL		
	_	A	BOVE IN	FORM	ATIO	N. IF	SO, R	EJECT SA	AMPLE	AND DO	א כ				ANAL	YST:			PM		
		P	ERFORM	ANAL	YSIS									į							 -
RADIATI	ON:	P	os			NEG									DATE	PERF	ORMED	:	10/2	4/13	,
						MEG	<u>'</u>	Γ			MRE	M/HI							1		
1	YS. STA	_	Coro	R		LARIT		WA So		REA	CT	pН	HEX DCM SOL	PER	ох	CN	SUL	BIEL-	FLASH	PCBs	PCB TEST COMP
AIIO	E	L	Use		C L	C	O P	SOLUE	шту	1	7		s	+				STEIN	POINT	(25ppm)	N
Y Q L E U I		บ D	STD COLOI		E A	0	A	S-P	S-I	A=A		STD.	OR	OR	OR	OR	+ OR	+ OR	<60*C	+ OR	U
RIID		G	001001	٦	R	U	Q U	DEN! Ho		W=H	20	Unit	I	-	-	-	-	-	+		M B
S D A	+-	E	<u> </u>			Y	E												OR		E
В	+																				R
c	╁╌┨									L											
COMMEN	Tre-										\prod										···
COMMEN	119											N	D -	- 54	nel	٠		I			
PCB CON	₹C					PPM			Ft A	SH POT	ATT			*C							
Data Re	VIEWE	R:								Direction D	ATA	REVIE	W DA	TE:	OTH	ER TE	ST				
FIELD RE	AIEME	:R:							_	F	IELD .	REVIE	W DA	TE:				•			
DULK OK	OUP; _													STREAM							
K GR			er:											TREAM		BER:					
MEN	19:																				
			 -																		-
Zames - F																					
Cemron Em	vironme	ntai S	ervices, I	nc.\do	cume	nts\di	rumlo	g.doc													ľ

*:

													DRU	M			Tr)RIIM)	VO. (3	356		
L.	KEMRON ENVIRONMENTAL			. 1]		VENT		7				T No. <u>SF</u>		 .						
													LOC				- 1		1110.51	-	_	
Pp	TECT		-AII	ON <u>s</u>					& DRI				GER _	\mathbb{C}	.ر			_ DA	TE IO	2316	3	
	ONE_		MIA	·1 —		ARY	BEL	AND						R_C	<u>. C</u>				Tn	ME_		
-											WEATI	IER.								- · · · · · · · · · · · · · · · · · · ·		
	TYP		POL	Y-LIN			FI	BER			TEEL		F	OLY	K	Si	AINL	SSS STI	REL.	Nic	KEI	
			TION	V: ME	GTOP	OT.C			_Cros	E TO		N N								1410		
DRI	JM S	ZE:	110		85 85		55 55			42 d	OOD	Ц		AIR	П		OOR	K				
DRI	мС	ONT	NTS	: Voi				LL	त	3/			30 📋 1/2 🔲		16		<u>10</u>		5		HER [C	Al
Ovi	RPA	KEI): 		No	0 🛭					VERPAC			TRER	1/4	EEL C	Poi	<1/4	<u> </u>	MT		
		Pi	iys. S	STATE			Coro	10		CLARIT			LAYER		01	DEL L	1 101			ACK SIZE:		
L	L		s	G I	S	-			c	C			HICKNE						LD ANALY	ysis		
A	I		0	E	Ĺ		Use		L	L	OP			1	pH			SÜ	PID/C	VA_	ppm	
Y	Q	4	L	L	Ŭ]	STD		E	õ	A		INCHES		OTHER		1_	61	110.	staine		
E	U	- 1	I		D	0	COLOR	RS	A	U	Q		2310222		OIHER		1/ 5	Cir	J Can	<u>James</u>		
S	D	1	D	- 1	G E				R	D	υ			- 1			(1	11/7	シル))		
A	1	╁	\dashv		<u> </u>	 			1	Y	Е			_						,		
В	V	I				\vdash			 \					-			<u> </u>	RUM L	ABELS/M/	ARKINGS		
C	Д	\perp	\Box						/ \t					.	DOTH	TA 77			T 73.7.0			
MEC	MAN		0 v	ese	د. ال										<u> </u>	<u> </u>			UN/	NA	-	 -
CHE	MICA	NA	W.	F116	AIF.	100	1.1		sdu	L.						· ·						
- 'D	ITION	AL I	NFOE	MATIC	SN.	700	>1 /Jv	74	SQU	1104	<u> </u>											
																			-			
												_		-								
	. г]	T	ABOR	ATOR	YH	AZAR	D C	ATEGO	RIZAT	TON D	ATA				HAZA	RD C	ATEGO	RY:	Nt		
	_		A	BOVE	NFORA	AATIO	on do N. If	DES N SO. R	OT MATO	CH THE	AND DO	NOT			- 1					n m		
			P	ERFORI	ANA N	Lysis		,			~~DO	NOI					-:			<i></i>		_
RADI	ATION	J•	10	os			37-	—								DATE	PERF	ORMED): J	10/2	1/12	
T	11101	<u>. </u>					NEG				<u> </u>	MRI	EM/HR	-		٠					<u> </u>	_
	Рнуѕ.	STAT	E	Cor	OR	C	LARIT	Y		TER	REAC		pН	HEX DCM	PER	ox	CN	SUL	BIEL-	P	DOD-	PCB
LL	S		S	 -		С	C	0	So	I.			<u> </u>	SOL		-	<u> </u>	SOL	STEIN	Flash Point	PCBs (25ppm)	COMP
A I Y Q	O L	E	L U	Us ST		L	L	P	Solue		l	ĺ		s	+	+	+	+	+	<60°C		N
E U	I	-	D	COL		E A	U	A Q	S-P Den		A=Ai W=H2		STD. Unit	OR	OR	OR	OR	OR	OR	1	+ OR	U M
R I S D	D	- 1	G E			R	D	บ	Ho		" 112	~	ONII	I	-	-	-	-	-	+		В
A		一					Y	Е							 					OR -		E R
В	_	十			\dashv							4			<u> </u>							
c	$\neg \uparrow$	\dashv			_		\vdash					\dashv			<u> </u>							
Сомм	ENTS												<u> </u>		<u> </u>							
													~0	<u>- 5</u>	m	o La						
PCB C							PPM			FLAS	SH POIN	T_			c	Отн	ER TF	ST				
Data : Field :	REVI	EWE	 R:					, 		~	D.	ATA	REVIE	W DAT	TE:							
BULK (=				Fu	ELD	KEVIE	W DAT	E:							
			JMB	ER:	-						 -				TREAM							=
LJMM									——————————————————————————————————————		—		<u>₩</u>	STE S	TREAM	NUM	BER:					
									_				 ·							-		
															 -							
Cemron	Enviro	nmei	ital S	ervices,	Inc.\d	ocume			a dan													

	¥7-										DRI				I	ORUM 1	No. <u>13</u> .	57		
J.	KEMRON ENVIRONMENTAL			,		I	NVEN	TOR	Y		I	ROJEC	t No. <u>Si</u>	1867						
ΙP	ROJEC	T [(Tratt	ON SU	DEDIOD	DAR		0.75-			Lo				F	AGE_		OF		
P	ROJEC	T Co	ONTA	CT	GAR						OGGER					Da	TE 10	13 13		
	HONE			·	UAK	I DEL	AND				SAMPLI	er <u>(</u>	<u> </u>				Tn	VIE	· · · · · · · · · · · · · · · · · · ·	
				Y-LINEI		123				WEATH										
L	D TY	PE:	- 1 O1	RING		<u></u>	BER	CTOS	SE TO	TEEL	K.	POLY	X	S	TAINL	ESS ST	EEL 🔲	Nic	KEL _	
D	RUM (CONI	DITIO	N: MEE	TOOT	SPEC.	-			OOD		FAIR		D	OOR	X				
	RUM S				85	55	口		42		30	· Aux	16				5 🗍	OTT	HER 6	541
	VERPA			: Volu			ᇿ	구		4	1/2		1/4	X		<1/4		MI		<u> </u>
۲	11111				No 2	71: Y.	ES _	1	0	VERPAC	K TYPE:		☐ Sī	EEL [] Po	LY 🗌	OVERPA	ACK SIZE:		
-	1.			STATE		Coro	OR		CLARIT	LA	LAYE THICKN					Fie	LD ANALY	rsis		
L	- 1 "		s o	1	S L	T Town		C	C	0			pH_			SÙ	PID/C		5 ppm	
Y	1 7		L	_ [บ	USE Ste		LE	L	P	_				,				≥_ppm	
E		- 1	I	- 1	Ď	COLO		Ā	บ	AQ	Inche	S	OTHER				1 Co	utai	<u> </u>	
R	1 -		D	- 1	G			R	D	ן ט										
A		-			E			-	Y	E							 .			
B	$+\lambda$	+	-+					₩.							r	DRUM L	ABELS/M/	NKINGS	·	
C	$I\Lambda$				\dashv			1			·		DOTI	T A 177						
,_	~ -		A \ /							LL			DOTE	IAZ_			UN/	NA		
CH	GNA	ME_	Y	وجدا	Me	0/1		4.1	,,	.	·									•
		NAL.	AME . ÎNFOI	EY!	<u> </u>	Shi A	<u>og</u>	<u> 2010</u>	tion	<u>U</u>										
\ 				.durinoi.																
																				
ł			I	ABORA	ORY I	IAZAI	W C	ATEGO	RIZAT	TON DA	TA		T	HAZA	RD C	ATEGO	DV•	-	1.	
1		Ц	7	MARK IF I ABOVE INF	DESCRIP DRMATI	TION D	OES N	OT MATO	THE	· · · · · ·								Pm		
1			P	ERFORM A	ANALYS	S	30, K	EJECT 34	IMPLE	AND DO	NOT				,,,,,			pm.		_
RAT	DIATIO) <u>)</u>)oo l'T		- 2:							- 1	DATE	PERF	ORME): l	10/24	1/15	**
1	JIAIIC	įN.	<u>r</u>	Pos 🗌		NEC	}	т		N	REM/H								4.4.3	- .
1 1	PHY	s. Sta	TE	Coro	R	CLARI	Υ	WA	TER	REAC	Han	HEX DCM		ox	CN	SUL	7		non-	PCB
LI	LS	G	S	 	+ 0	С	0	So	L	 		SOL			CIN	SUL	BIEL- STEIN	FLASH POINT	PCBs (25ppm)	Test Comp
AI	Q L	E	L	USE STD	L	L.	P	SOLUB		ŀ		s	+	+	+	+	+	<60 ^a C		N
EI	J I	~	D	COLOR	S A		AQ	S-P		A=An W=H2		OR I	OR	OR	OR	OR	OR	-00°C	+ OR	U M
R I			G	}	R		ן ט	Ho		"	ONI	'	-	-	-	-	-	+ OR	-	В
A					1.	/ 	E			 		┼	 	<u> </u>	<u> </u>	<u> </u>	<u> </u>	OR.		E R
В				Colorie	SS	4—		11		-	 _	-	+-1	1.1		1				
C					1/	1-		- 7	· ·	N	17	N	N	N	N	N	N	7		
Сом	MENT	rs: _				<u> </u>	لــــا			L		1		<u> </u>	<u> </u>	Ĺ				
DOD	Co	<u> </u>										54 F	· So	LA!						
	CONO		2D ·			_ PPM			FLA	SH POIN	Γ		*C	Отн	ER TE	ST				
FIELI	REV	TEWI	ER:						-	DA	TA REVI	W DA	TE:							
	GRO		=							rie	LD REVI									
	GRO		UMB	ER:									STREAM STREAM		DE					
i w	MENT	s:									W	MOTE S	IKEAN	INUM	BEK:		-			
																	·			-
																				-
Kemro	n Envi	ronm	ental S	ervices, In	c. docu	nents\d	rumlo	a doc												i

1			-				T			DRU				I	DRUM I	No(3:	58	 .	 ,
l. K	KEMRON ENVIRONMENTAL			,		I	NVEN	FOR	Y		P	ROJEC	t No. <u>Sf</u>	1867					
PROJE	ECT LOCATION SUPERIOR BARRELL									LO				_ P	AGE_		OF		
PROJE	CT CC)NTA(CT	GAD	V DAK	KELL				OGGER _					_ Da	TE 10	23/13	3	
PHON				Unit	1 DEL	AND	·			Sample	R_C_	ىك				Tr	WE		
			Y-LINE	рП	F	BER			WEATH										
LDT	PE:		RING	TOP	Г	T	CLOS	E TO	TEEL [x	POLY	X	S	TAINL	ESS ST	EEL 📗	Nic	KEL 🗌	
DRUM	CONI	OTTO	V: MEE		SPEC.			-	OOD		FAIR		Pr	OOR	N				
DRUM			: Volt	85		\Box		42		30		16				5 🗍	OTT	HER (241
OVERP			; VOL	No 1		ЛЦ [<u>×</u>		4	1/2		1/4			<1/4		MT		211
			STATE						VERPACI	K TYPE: Laye		L ST	EEL [Po	LY 🗌	OVERP/	ACK SIZE:		
L	L	S S		-	Cou	OR	+	CLARIT	Y	THICKN					FIE	LD ANALY	YSIS		
	ī	ő	G E	S L	Üsi	,	C	C	0			pH_			SÚ	PID/C	VA O	ppm	
Y	Q	L	L	Ū	STI	-	E	L	PA	Inche				1 -	GI	x i			
_	U	I		D	COLO	RS	Ā	บั		INCHE	•	OTHER	·	<u> </u>		_=			
	D	D		G E			R	D	Ü		- 1			a	rei	ر			
A	7			-			\	Y	E										
В				_			┰							<u>r</u>	RUM L	ABELS/M/	ARKINGS		
c /	<u>\</u>	-1					1				\dashv	DOTE	IA7			TDIA	NT A		
MFG NA	A NATE	.0.1	D Cr.	1:								2011	<u> </u>			_ UN/	NA	*	
CHEMIC	AL N	AME	FV.	PEI	·shi	l Mai	001	I)											
חדופר	DNAL]	INFOR	OITAMS	VV		. 	3010	110	<u>. </u>						 ,				
			4707																 _
		N	MARK IF	TURY I Descrip	IAZAI	RD CA	ATEGO	RIZAT	TON DA	ГА			HAZA	RD C	ATEGO	RY:	N		
		A	BOVE IN	FORMAT	ION. If	SO, R	EJECT S	AMPLE	AND DO N	ют		- 1	ANAL	YST:			² /~		
		P	ERFORM	ANALYS	IS						-	ļ							
RADIATI	ON:	P	os 🔲		NE	ī	·		1/4	REM/HI			DATE	PERF	ORMEL	:16	124	113	_
PH	ys. Sta	TE	Core					-	101	KCW/HI	HEX		т	т	γ				
ı			Coro	JK.	CLARI	ΓY	WA:		REACT	pH	DCM SOL	PER	ОХ	CN	SUL	BIEL-	FLASH	PCBs	PCB Test
LS	E	L	Use	L		O P	Solue					1-	+	 	 	STEIN	POINT	(25ppm)	COMP
QL	L	U D	STD	E	0	A	S-P	S-I	A=AIR	STD.	OR	OR	+ OR	+ OR	+	+	<60°C	+	Ü
ID		G	Color	RS A		Q	Den:		W=H20		I	-	-	- UK	OR -	OR -	+	OR:	M B
D	╂╾┥	E			Y	Ē	110			.					·		OR:		E
	+				-								_				-		R
1	1-1					\vdash													
OMMEN	TS:	i				Ш													
							 -			N6	5/	hapl	E						
CB CON	ic				_ PPM			FLAS	SH POINT			· ·	0	CD ==					_
ATA RE	VIEWE	:R:						_	DA	A REVIE	W DA1	Œ:		EK 1E	ST				
ELD REV	OLID.								FIE	D KEVE	WDA	E							
C GRO	OUP N	UMBI	ER:									TREAM							
MEN	rs:										ASTE S	TREAM	NUM	BER:					
											<u>-</u>								
					-														
mron Env	ironme	ntal S	ervices l	nc Idocus		<u></u>	- 4												ļ

Exhibit 3

MATERIAL SAFETY DATA SHEET

HMIS Ratings Ḥealth: 0 Flammability: 0 Reactivity: 0

Identity: Eyesaline® Sol	ution - Product #s 32-0	000400, 32-0004	01, 32-000502, 32-	001050		
	ye & Face Protection, Inc.	(a Honeywell C	ompany)	<u> </u>	Emer	gency Telephone: 1-800-430-5490
	st Highway 151	(2				nation Telephone: 1-800-543-4842
	ville, WI 53818 USA				Date I	Prepared: 06/13/12
	ngredients/identify infor	mation				
Hazardous Component		OSHA	ACGIH	Other limits		% (optional)
•	ntity; Common Name(s))	PEL	TLV	recommend	led	<u>. </u>
BENZALKONIUM CHLO	RIDE CAS #8001-54-5	NONE	NONE	N/A		<0.1%
Section III - Physical/Gi	remical Characteristics					A Committee of the Comm
Boiling Point: 200°F (93	3.3°C)	Specific Gravi	ty (H2O)=1: NOT D	ETERMINE)	
Vapor Pressure (mm H	g.): 760	Melting Point:	N/A			
Vapor Density (Air = 1):	NOT DETERMINED.	Evaporation R	ate (Butyl Acetate	= 1): NOT D	ETERN	MINED
Solubility in Water: 100						
	COLORLESS LIQUID WI	TH NO DISCER	NABLE ODOR.			
Section IV - Fire and Ex						
Flash Point (Method Us	·	Flammable Lir		LEL: N/A		UEL: N/A
	HIS IS A NONFLAMMABL	E AQUEOUS S	OLUTION.			
Special Fire Fighting Pr						
Unusual Fire and Explo		***				
Section V - Reactivity E		In	A Id. Tille DDO	VICT IS STA	DI E A	ND CONSIDERED NON-REACTIVE
Stability	Unstable: NO Stable: YES		IAL CONDITIONS			
Incompatibility (Materia	als to Avoid): NONE KNO	<u> </u>	IAL CONDITIONS	31 0101010		00/102.
	tion or Byproducts: NON				<u> </u>	
Hazardous	May Occur: NO		Avoid: NONE			
Polymerization	Will Not Occur: YES		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
Section VI - Health Haz	ard Data					
	halation? NO Skin? NO	O Ingestion?	YES			
Health Hazards (Acute	and Chronic): INGESTIO	N OF VOLUME	S IN EXCESS OF 2	20 LITERS M	AY CA	USE GASTRIC IRRITATION.
Carcinogenicity: NTF	P? NO IARC Monograp	hs? NO OS	IA Regulated? NO			
Signs and Symptoms of	of Exposure: N/A					
	nerally Aggravated by Ex					
						ESTION OF LARGE VOLUMES
OF THE SOLUTION, INI	DUCE VOMITING AND O	BSERVE THE P	ATIENT FOR GAS	TRIC IRRITA	TION.	
	ns for Safe Handling and					3.4
1 -	ase Material is Released	or Spilled: FLU	JSH AREA WITH W	ATER. THE	SOLU	TION IS NOT RCRA
HAZARDOUS WASTE.						
Waste Disposal Method		50 NOT 55	FEZE OD EVDOOR	TO TEMPE	DATIN	DEC IN EVOLUE OF
Precautions to Be Take 110°F (43°C) FOR EXTE	en in Handling and Storing NDED PERIODS.	ng: DO NOI∷FR	EEZE OR EXPOSE	E TO TEMPE	RATU	KES IN EXCESS OF
Other Precautions: N/A						
Section VIII - Control M	leasures .			fra i se		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Respiratory Protection	: N/A	-		- wednesday - regional values - reside		
Ventilation	Local Exhaust: N/A			Special: N/	Ą	
	Mechanical: N/A			Other: N/A		
Protective Gloves: N/A			Eye Protection: N	i/A		
Other Protective Clothi	_					
Work Hygienic Practice	es: N/A	<u>-</u>				

SENDER: COMPLETE THIS SECTION	,	COMPLETE THIS SECTION ON D	ELIVERY
 Complete items 1, 2, and 3. Also complitem 4 if Restricted Delivery is desired. Print your name and address on the reviso that we can return the card to you. Attach this card to the back of the mail or on the front if space permits. 	erse	A. Signature **Moule Solution B. Received by (Printed Name)	Agent Addressee C. Date of Delivery
Article Addressed to: D_R	1.4.7.	D. Is delivery address different from If YES, enter delivery address be	_
Honeswell Safety Products L (EyeSaline) 900 Douglas Pike	10 12 E		
Smithfield, RI 02917 Attn: Robert Peterson, President/&		3. Service Type Certified Mail	Mail lecelpt for Merchandise
·		4. Restricted Delivery? (Extra Fee)	☐ Yes
Article Number (Transfer from service.label)	7018	2 1640 0001 8519	2548
PS Form 3811, August 2001	Domestic Retu	ırn Receipt	102595-01-M-250





Postage & Fees Paid USPS Permit No. G-10

First-Class Mail

Bonnie Hriczko
U.S. Environmental Protection Agency
Removal Action Branch-(MS-211)
Building 205
2890 Wooodbridge Avenue
Edison, New Jersey 08837-3679

From: (202) 942-5000 Sarah Greer Arnold & Porter LLP 555 12th Street, N.W.

Washington, DC 20004

Origin ID: RDVA



J14101402070326

BILL SENDER

SHIP TO: (732) 321-6647

Bonnie Hriczko

US Environmental Protection Agency Removal Action Branch

2890 Woodbridge Ave, MS-211

Edison, NJ 08837

Ship Date: 20MAR14 ActWgt: 0:5 LB CAD: 103991047/WSXI2500

Delivery Address Bar Code



Ref# 0016151.000

Invoice # PO # Dept #

> TRK# 0201

7982 8426 3820

E2 LDJA

FRI - 21 MAR 10:30A PRIORITY OVERNIGHT

> DSR 08837 NJ-US

EWR

FOLD on this line and place in shipping pouch with bar code and delivery address visible

- 1. Fold the first printed page in half and use as the shipping label.
- 2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
- 3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.